

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MT. HAWLEY INSURANCE)
COMPANY,)
)
Plaintiff,)
)
vs.) No. 1:22-cv-10354
)
BEACH CRUISER, LLC)
and FLYWAY)
MANAGEMENT, LLC,)
)
Defendants.)
)
and)
)
NATIONWIDE GENERAL)
INSURANCE COMPANY,)
)
Intervenor Defendant.)

The deposition via Zoom of
MT. HAWLEY INSURANCE COMPANY called by
the Defendant for examination, taken
pursuant to notice and pursuant to the
Federal Rules of Civil Procedure for the
United States District Courts pertaining
to the taking of depositions, taken
before Alyssa N. Kuipers, Certified
Shorthand Reporter, Registered
Professional Reporter, commencing at
10:09 a.m. on the 15th day of
December, 2023.

2

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15 On behalf of the Defendants
16 Beach Cruiser, LLC and
17 Flyway Management, LLC;

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25 On behalf of the Intervenor
Defendant Nationwide General
Insurance Company.

* * * * *

4

1 (Witness sworn.)
2 WHEREUPON:
3 MT. HAWLEY INSURANCE COMPANY,
4 called as a witness herein, having been
5 first duly sworn, was examined and
6 testified as follows:

7 DIRECT EXAMINATION
8 BY MR. KATZENMEIER:

9 Q. Well, good morning,
10 Mr. Brownell. My name is Lucas
11 Katzenmeier. I'm an attorney with Riker
12 Danzig. We represent Nationwide General
13 Insurance Company in this matter,
14 intervener defendant.

15 Before we get started on the
16 deposition proper, I'm going to give you
17 some ground rules. First, you just took
18 an oath. That means you're required to
19 tell the truth in this deposition. Do
20 you understand that?

21 A. Yes.

22 Q. Okay. And as you're aware,
23 we have a court reporter with us, who is
24 taking down everything we say, because of
25 that and especially because this

3

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21 (Exhibits I and J retained by
22 Mr. Pierantoni.)
23
24
25

5

1 deposition is virtual, your responses
2 need to be verbal. You have to say yes,
3 no, or otherwise verbalize your response
4 to a question. That means you can't just
5 shake your head no. Do you understand
6 that?

7 A. Yes, I do.

8 Q. Okay. Second, because we
9 need a clean transcript, we have to avoid
10 talking over each other, so when I ask a
11 question, please let me finish my
12 question before you start answering. And
13 when you answer, I will try to let you
14 finish your answer before I ask another
15 question. Is that okay?

16 A. Yes.

17 Q. Okay. When we're going
18 through these and you're responding to my
19 questions, I don't want you to guess in
20 your answers. If you don't know the
21 answer to the question, you can say that.
22 If you can give me an approximation of
23 something, that's okay. Just tell me
24 you're approximating, but don't guess.
25 Do you understand that?

6

1 A. Yes.

2 Q. Okay. Perfect. I'm not
3 here to trick you when we're doing this.
4 If you don't understand a question I'm
5 asking, please ask for clarification. If
6 you answer my question without asking for
7 clarification, I'll assume you heard my
8 question and you understood it.

9 With that said, during the
10 course of this deposition, your attorney,
11 Mr. Delahunt, may object to a question.
12 After your attorney has voiced his
13 objection, pause. You can answer the
14 question unless your attorney instructs
15 you not to, though.

16 If you need a break for any
17 reason, just please let me know. I'm
18 amenable to that. All I ask is, if
19 there's a question pending at the time
20 you request to take a break, the question
21 is answered before we leave. Is that
22 okay for you?

23 A. Yes.

24 Q. Okay. And, lastly, you
25 shouldn't be communicating with anyone

7

1 else during the course of the deposition.
2 I mean like taking phone calls, texting,
3 anything like that, e-mails. Do you have
4 a phone on you right now?

5 A. I have a personal cell phone
6 that's on the table in the sleep mode
7 just for family emergency purposes.

8 Q. Okay. Perfect. So, yeah.
9 As long as you understand that, we should
10 be fine. Okay.

11 MR. DELAHUNT: I'm sorry. I
12 just want to test if you can hear
13 me on Kevin's microphone.

14 MR. KATZENMEIER: It's a
15 little faint, but yes.

16 MR. DELAHUNT: Okay. All
17 right. If I need to talk, I will
18 speak up. Alyssa, can you hear me
19 sufficiently?

20 THE COURT REPORTER: Yes, I
21 can hear you.

22 BY MR. KATZENMEIER:

23 Q. Okay. So, Mr. Brownell,
24 have you taken any medications today that
25 could affect your ability to provide

8

1 truthful testimony?

2 A. No.

3 Q. Do you have any health
4 problems that could affect your ability
5 to provide truthful testimony?

6 A. No.

7 Q. Okay. Have you ever had a
8 deposition taken before?

9 A. Yes.

10 Q. Okay. How many times, would
11 you say?

12 A. Roughly a half dozen.

13 Q. A half dozen. Okay. And
14 have those all been within the past
15 couple years, within the past year?

16 A. Within the past 10 to
17 15 years total.

18 Q. 10 to 15 years. Okay. And
19 for what reason was your deposition taken
20 previously?

21 A. With respect to my current
22 or former jobs.

23 Q. Okay. So we will -- we'll
24 get into that in a second.

25 Have you ever provided

9

1 testimony at a trial before?

2 A. No.

3 Q. Okay. Did you review any
4 documents to refresh your recollection
5 prior to this deposition?

6 A. I did review documents, but
7 not for that purpose.

8 Q. Okay. For what purpose did
9 you review documents prior to this
10 deposition?

11 A. To prepare for this
12 deposition.

13 Q. To prepare for this
14 deposition. Okay. What documents were
15 those?

16 A. All of them were documents
17 that had been produced as part of
18 Mt. Hawley's document production in this
19 lawsuit.

20 Q. Okay. Did you review any
21 pleadings prior to this deposition?

22 A. Not specifically.

23 Q. Okay. By which I mean, for
24 example, Mt. Hawley's declaratory
25 judgment complaint in this action.

<p style="text-align: right;">10</p> <p>1 A. I may have seen that at some</p> <p>2 point, but I don't have a specific</p> <p>3 recollection of doing so. I did not</p> <p>4 review the complaint in preparation for</p> <p>5 this deposition.</p> <p>6 Q. Okay. Thank you very much.</p> <p>7 Just so we have it going back, can you</p> <p>8 please state your full name.</p> <p>9 A. Kevin Brownell, B R O W N E</p> <p>10 L L.</p> <p>11 Q. Okay. And your age for me,</p> <p>12 please?</p> <p>13 A. 49.</p> <p>14 Q. Thank you, sir. So you</p> <p>15 mentioned you have been deposed in</p> <p>16 connection with your current position and</p> <p>17 prior positions. What is your current --</p> <p>18 who is your current employer?</p> <p>19 A. RLI.</p> <p>20 Q. RLI. And is that -- that's</p> <p>21 an insurance company?</p> <p>22 A. Yes.</p> <p>23 Q. Or is that a holding</p> <p>24 company?</p> <p>25 A. It is both an insurer</p>	<p style="text-align: right;">11</p> <p>1 itself, and also it is the parent company</p> <p>2 of Mt. Hawley Insurance Company.</p> <p>3 Q. Okay. So is Mt. Hawley a</p> <p>4 wholly-owned subsidiary of RLI?</p> <p>5 A. Yes.</p> <p>6 Q. How long have you been at</p> <p>7 RLI?</p> <p>8 A. Since August of 2018.</p> <p>9 Q. August 2018. Okay. And</p> <p>10 what is your current position at RLI?</p> <p>11 A. Assistant Vice-President,</p> <p>12 Claims.</p> <p>13 Q. Okay. How long have you</p> <p>14 been in that position?</p> <p>15 A. Since March 2023.</p> <p>16 Q. March 2023. And what do you</p> <p>17 do as Assistant Vice-President of Claims?</p> <p>18 A. I manage and run the</p> <p>19 casualty, general liability claims team</p> <p>20 for the Central and South regions.</p> <p>21 Q. Okay. And let's dig into</p> <p>22 that a little bit.</p> <p>23 As far as managing and</p> <p>24 running claims, what does that entail?</p> <p>25 A. I oversee the claims</p>
<p style="text-align: right;">12</p> <p>1 examiners that handle commercial general</p> <p>2 liability claims, casualty claims in the</p> <p>3 Central and South regions of the United</p> <p>4 States.</p> <p>5 Q. Okay. And when you say</p> <p>6 "Central and South regions of the United</p> <p>7 States," would that include areas like</p> <p>8 South Carolina?</p> <p>9 A. South Carolina is part of my</p> <p>10 territory, yes.</p> <p>11 Q. Okay. Sounds good.</p> <p>12 Prior to this position, what</p> <p>13 position did you hold in RLI or</p> <p>14 elsewhere?</p> <p>15 A. Claims Director.</p> <p>16 Q. Claims Director. Was that</p> <p>17 at RLI?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And when were you the</p> <p>20 Claims Director at RLI?</p> <p>21 A. I had that title from the</p> <p>22 beginning of my employment at RLI through</p> <p>23 March of 2023.</p> <p>24 Q. Okay. And when did you</p> <p>25 begin your employment at RLI?</p>	<p style="text-align: right;">13</p> <p>1 A. August of 2018.</p> <p>2 Q. August 2018. Okay. What</p> <p>3 was your position before taking the</p> <p>4 position at RLI?</p> <p>5 A. I had a claim examiner</p> <p>6 position at a company called Starr</p> <p>7 Indemnity.</p> <p>8 Q. And when did you leave that</p> <p>9 position?</p> <p>10 A. When I came to RLI.</p> <p>11 Q. Okay. And when did you</p> <p>12 start that position?</p> <p>13 A. I don't remember the exact</p> <p>14 date, but it was in 2014.</p> <p>15 Q. 2014. Okay. And what were</p> <p>16 your job responsibilities at Starr?</p> <p>17 A. I was a claims examiner.</p> <p>18 Q. Claims examiner. Okay.</p> <p>19 Mr. Brownell, could you tell me the</p> <p>20 highest level of education you have?</p> <p>21 A. I have a law degree.</p> <p>22 Q. A law degree. Okay. And</p> <p>23 where did you obtain the law degree?</p> <p>24 A. University of Illinois at</p> <p>25 Urbana-Champaign.</p>

26

1 refreshes our memory.

2 Okay. Mr. Brownell, can you
3 see my screen?

4 A. Yes.

5 Q. Okay. So what I have up for
6 you is an e-mail right now. It appears
7 to be from David Hoffman. Does that look
8 correct?

9 A. Yes.

10 Q. Okay. And it appears to be
11 sent to Drew Augustine. Do you know who
12 Drew Augustine is?

13 A. It's my understanding he's
14 the property manager for this property
15 with Beach Cruiser.

16 Q. And it looks like it also
17 went to someone at Flyway; is that
18 correct?

19 A. Yes.

20 Q. Okay. So I guess, just
21 reading the first paragraph, the first
22 sentence -- you can either read it
23 yourself or I can read it out loud into
24 the record.

25 A. I can read it myself.

28

1 Mr. Brownell, can you see my screen?
2 (Nationwide Deposition Exhibit B
3 marked for identification.)

4 BY THE WITNESS:

5 A. Yes.

6 Q. Thank you. We're back on
7 the supplemental dwelling application,
8 correct?

9 A. Yes.

10 Q. Okay. So I just want you to
11 take me through the process of this
12 supplemental dwelling application and
13 also the basic application. So once --
14 Putting aside the -- whether there was a
15 misrepresentation or not, in the normal
16 course of events, the insured fills this
17 out. Who does it go to?

18 MR. DELAHUNT: I'm going to
19 object to the extent that that
20 assumes the insured fills out the
21 application. That hasn't been put
22 into evidence yet.

23 BY THE WITNESS:

24 A. It depends on which product
25 we're talking about. The product at

27

1 Q. Okay. Would it be correct
2 to say that that first sentence confirms
3 the rental units at 146 President Street
4 were rented out both in Airbnb and Vrbo?

5 A. Yes. This appears to be
6 Mr. Hoffman's e-mail summary of portions
7 of the phone call he had earlier that
8 day.

9 Q. Okay. And the date of this
10 e-mail is August 17th, 2022, correct?

11 A. Yes.

12 Q. Would this be the final
13 confirmation that you referred to
14 earlier?

15 A. No.

16 Q. No? Would the final
17 confirmation have taken the form of an
18 e-mail to Beach Cruiser or Flyway?

19 A. I would have to refer to the
20 claim notes to answer that question.

21 Q. Okay. I'll stop sharing.
22 And before we get too far away from that,
23 let's mark that as Nationwide Exhibit B.
24 Okay. So I'm going to -- I think I can
25 share my screen here again. All right.

29

1 issue here is what we call general
2 binding authority, or GBA for short.
3 Within GBA, the process is that the
4 managing general agent, which in this
5 case is Bass, would obtain a completed
6 application and supplemental application
7 from the retail agent.

8 Q. Okay. And who drafted the
9 dwelling supplemental application?

10 A. This particular supplemental
11 application was actually prepared by a
12 different insurance company, RSUI.

13 Q. Okay. Is this dwelling
14 application drafted by RSUI used by
15 Mt. Hawley?

16 A. Not specifically. However,
17 it's not uncommon for Mt. Hawley to
18 accept supplemental applications on
19 another insurance company's form provided
20 that it asks the same information or
21 similar information that we would ask.

22 Q. Okay. So, I guess, put
23 another way: This isn't the standard
24 dwelling application used by
25 Mt. Hawley; would that be fair?

30

1 A. That's fair.

2 **Q. Okay. So assuming -- once**
 3 **this -- assuming it's been filled out by**
 4 **the insured, once a supplemental dwelling**
 5 **application is submitted by an insurance**
 6 **retail agent, who does it go to?**

7 A. For this product, it goes to
 8 the MGA, which is Bass.

9 **Q. And you said the MGA. Can**
 10 **you tell me what that means?**

11 A. Managing general agent.

12 **Q. Okay. And you said that was**
 13 **Bass?**

14 A. Bass Underwriters, yes.

15 **Q. Bass Underwriters. Okay.**
 16 **And is Bass Underwriters the MGA for**
 17 **Mt. Hawley?**

18 A. It's one of several.

19 **Q. It's one of several. Is**
 20 **Bass Underwriters owned by Mt. Hawley?**

21 A. No.

22 **Q. Okay. As far as you know,**
 23 **does Bass Underwriters underwrite for**
 24 **companies other than Mt. Hawley?**

25 A. I believe that they do.

32

1 **Q. Of course.**

2 A. If the application --
 3 information submitted with the
 4 application falls within the guidelines,
 5 Bass is authorized to issue a policy.
 6 There are certain times where the
 7 guidelines require that, depending on the
 8 answers to certain questions in the
 9 applications, Bass has to refer or submit
 10 the application into a Mt. Hawley
 11 underwriter for review before they can --
 12 before a policy can be issued.

13 **Q. Okay. And you mentioned the**
 14 **underwriting guidelines. We'll dig into**
 15 **that, but I'm going to pull them up, just**
 16 **so we have them for reference while we're**
 17 **discussing it.**

18 **Okay. Mr. Brownell, can you**
 19 **see my screen?**

20 A. Yes.

21 **Q. Okay. Can we mark this as**
 22 **Nationwide Exhibit C.**

23 **Mr. Brownell, does this look**
 24 **like the underwriting guidelines you were**
 25 **just referring to?**

31

1 **Q. Okay. And for this type of**
 2 **product insurance -- or for this type of**
 3 **insurance product, does Mt. Hawley use**
 4 **other underwriting companies aside from**
 5 **Bass Underwriters?**

6 A. Yes. At present, the GBA
 7 product, I believe, has nine different
 8 MGAs that they work with.

9 **Q. How about at the time this**
 10 **Mt. Hawley policy was issued? Do you**
 11 **know?**

12 A. I don't know for sure. At
 13 the time this product began, there were
 14 about four to five MGAs that they used
 15 and there are nine now, so it would be
 16 somewhere in between there.

17 **Q. So building on that, once**
 18 **this application has reached Bass, what**
 19 **would Bass do with the application?**

20 A. Bass has a set of
 21 underwriting guidelines that they have to
 22 follow when they are reviewing an
 23 application to determine whether a policy
 24 can be issued. And I'm speaking
 25 generally right now.

33

1 **(Nationwide Deposition Exhibit C**
 2 **marked for identification.)**

3 BY THE WITNESS:

4 A. For rental dwellings, yes.

5 **Q. Okay. So are there other**
 6 **underwriting guidelines that are provided**
 7 **by Mt. Hawley to Bass?**

8 A. For different classes of
 9 insureds, yes.

10 **Q. Would this have been the**
 11 **underwriting guidelines provided to Bass**
 12 **for the Mt. Hawley policy for the --**
 13 **Sorry. Let me strike that and clarify**
 14 **because I can see how that was a little**
 15 **confusing.**

16 **Would this have been the**
 17 **underwriting guidelines to be used in**
 18 **connection with the Mt. Hawley policy**
 19 **issued to Beach Cruiser in this case?**

20 A. Yes.

21 **Q. So you mentioned referrals a**
 22 **short while ago. I'm reading this**
 23 **sentence here. I don't know if you can**
 24 **see my cursor.**

25 A. Yes, I can.

34

1 **Q. It says short-term rentals**
 2 **less than 12 months and vacation rentals**
 3 **should be referred. Can you tell me what**
 4 **"referred" means in this sentence?**

5 A. That's what I indicated
 6 earlier, that if the application
 7 indicated that there was a short-term
 8 rental or a vacation rental for the
 9 property for which coverage was being
 10 sought, Bass would have to refer that
 11 application into a Mt. Hawley underwriter
 12 for review.

13 **Q. Okay. So assuming --**
 14 **hypothetically, if there were no issues**
 15 **or incorrect information relayed in an**
 16 **application, you mentioned Bass has the**
 17 **authority to issue a policy on behalf of**
 18 **Mt. Hawley; is that correct?**

19 A. As long as the risk falls
 20 within the underwriting guidelines and
 21 there are no facts which require a
 22 referral per those guidelines, yes.

23 **Q. So is Bass the entity that**
 24 **would be responsible for comparing the**
 25 **application to the underwriting**

36

1 **have been referred to Mt. Hawley?**

2 A. Yes.

3 **Q. Okay. How often does**
 4 **Mt. Hawley deal with Bass or communicate**
 5 **with Bass during the underwriting**
 6 **process?**

7 A. It depends on whether the
 8 application is referred or not.

9 **Q. Okay. Does Bass communicate**
 10 **with Mt. Hawley in the process of**
 11 **renewing a policy?**

12 A. I think the answer remains
 13 the same. It depends on if there's a
 14 reason for referral.

15 **Q. Okay. So in the event that**
 16 **Bass determines that no referral is**
 17 **necessary, what is the process for**
 18 **issuing a policy on behalf of Mt. Hawley**
 19 **in that event?**

20 A. I'm not sure what you mean
 21 by process of issuing a policy. If Bass
 22 concludes that there is no reason for
 23 referral and the risk otherwise falls
 24 within the underwriting guidelines, they
 25 may issue a policy to that insured.

35

1 **guidelines?**

2 A. Initially, yes.

3 **Q. Okay. So you say**
 4 **"initially, yes." After Bass, who would**
 5 **it be?**

6 A. It would be Mt. Hawley if it
 7 was a matter that had been referred.

8 **Q. Okay. But only if it had**
 9 **been referred?**

10 A. Correct.

11 **Q. So if Bass determined that**
 12 **the application fell within the**
 13 **underwriting guidelines without need for**
 14 **referral, Bass would have the authority**
 15 **to issue a policy on behalf of**
 16 **Mt. Hawley; is that correct?**

17 A. Yes.

18 **Q. Okay. So, for example, in**
 19 **the Mt. Hawley -- Sorry. Strike that.**

20 **In the application that was**
 21 **attached to Mt. Hawley's DJ complaint in**
 22 **this case, which I showed you earlier, if**
 23 **the application had marked yes instead**
 24 **under short-term rentals, is that a**
 25 **situation in which the application should**

37

1 **Q. Okay. And is there any sort**
 2 **of communication sent by Bass to**
 3 **Mt. Hawley when such a policy had been**
 4 **issued?**

5 A. I know that the policy is
 6 communicated back to Mt. Hawley, but I'm
 7 not exactly sure the form that that
 8 takes.

9 **Q. Okay. I mean, so is there**
 10 **any form of, I guess, confirmation sent**
 11 **from Bass to Mt. Hawley that a policy has**
 12 **been issued on Mt. Hawley's behalf?**

13 A. Bass provides a copy of the
 14 issued policy to Mt. Hawley.

15 **Q. Okay. And what does**
 16 **Mt. Hawley do with those policies, if**
 17 **anything?**

18 A. Nothing. They're stored
 19 electronically.

20 **Q. Okay. As far as you are**
 21 **aware, is there any sort of review**
 22 **process Bass undergoes with respect to**
 23 **the information contained on an**
 24 **application for insurance?**

25 A. I'm not sure I understand

46

1 **Q. Okay. And for either of**
 2 **those renewals, was there any**
 3 **communication between Bass and Mt. Hawley**
 4 **prior to the issuance of the renewal?**

5 A. I can't fully answer that
 6 question because in my preparation for
 7 this deposition, I only reviewed the
 8 documents that had been produced in
 9 discovery in the declaratory judgment
 10 case; and the underwriting file for that
 11 second renewal was not part of that
 12 documentation.

13 **Q. Okay. Let's see. The**
 14 **renewal that we just mentioned, the '22**
 15 **to '23 policy period, is that also**
 16 **subject to Mt. Hawley's now dismissed**
 17 **recision claim in this case?**

18 A. I'm sorry.

19 MR. DELAHUNT: Can you read that
 20 back?

21 (Record read as requested.)

22 MR. DELAHUNT: If you can
 23 answer, go ahead.

24 MR. KATZENMEIER: I can
 25 rephrase if not.

48

1 **Q. Yeah. Absolutely. Just let**
 2 **me know if I'm going too fast or too**
 3 **slow.**

4 A. Okay. You can jump to the
 5 last page. Yes, I recognize this
 6 document.

7 **Q. Okay. Can you tell me what**
 8 **this document is?**

9 A. This was a dual purpose
 10 letter sent to the insured to advise them
 11 of a notice of rescission of the policy
 12 and, alternatively, to assert the
 13 coverage defense based on the amended
 14 conditions endorsement.

15 **Q. Okay. And the date of this**
 16 **letter is November 14, 2022, correct?**

17 A. Yes.

18 **Q. And I'm looking at the**
 19 **Mt. Hawley policy number as GGL0026067.**
 20 **Do you understand that to be connected to**
 21 **the '21 to '22 policy period for the**
 22 **Mt. Hawley policy?**

23 A. According to what's there in
 24 the caption of that letter, yes.

25 **Q. Okay. Thank you. So**

47

1 BY THE WITNESS:

2 A. I think that calls for a
 3 legal conclusion.

4 MR. DELAHUNT: I don't want
 5 to interfere, but I will state I
 6 don't know that's a legal
 7 conclusion, but it would be
 8 answered by the pleading prior to
 9 withdrawal of the rescission claim.

10 I'm not going to answer the
 11 question for the witness, but --

12 BY MR. KATZENMEIER:

13 **Q. I think I can -- Let's do it**
 14 **another way.**

15 So I'll tell you what, I'm
 16 going to stop sharing my screen on the
 17 dwelling application. And I'm going to
 18 pull up correspondence issued in this
 19 case. Mr. Brownell, can you see my
 20 screen?

21 A. Yes.

22 **Q. Okay. Are you familiar with**
 23 **this document?**

24 A. Can I ask you to scroll
 25 through it quickly to the end, please?

49

1 following up on my earlier question,
 2 before we get too deep into this, would
 3 the 2022 to '23 renewal period you've
 4 mentioned also be included in this notice
 5 of rescission or does it just refer to the
 6 '21, '22 policy period?

7 A. It just refers to the '21,
 8 '22 policy period.

9 **Q. So as we sit here today, as**
 10 **far as you know, is the '22 to '23 policy**
 11 **period still in effect?**

12 A. If you mean has that policy
 13 been rescinded, no, it has not.

14 **Q. Okay. Thank you, sir. Did**
 15 **Mt. Hawley accept a premium payment for**
 16 **the '22 to '23 policy period?**

17 A. I assume it did.

18 **Q. Did Mt. Hawley accept a**
 19 **premium payment for the '21 to '22**
 20 **renewal period?**

21 A. I assume it did as well.

22 **Q. Okay. Was the premium for**
 23 **the '21 to '22 period ever returned?**

24 A. I don't believe it was. I
 25 believe it was offered, and this letter

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will refer to itself in that regard.

Q. And as far as you're aware, was that offer ever accepted?

A. I don't believe it was.

Q. So, speaking generally, what is your role, if any, in issuing insurance policies on behalf of Mt. Hawley?

A. My role individually?

Q. Yeah.

A. I work in the Claims Department. I'm not an underwriter, so I don't have any role in underwriting coverage.

Q. Okay. So I assume -- the same question as far as renewing policies. Do you have any role in renewing policies?

A. Same answer.

Q. Okay. And building on that, did you have any role in issuing or renewing the '21 to '22 renewal period for the Mt. Hawley policy at issue in this case?

A. Individually, no.

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below. That's why I was having you scroll down to the named insured form.

Q. I can continue.

A. It's coming. There it is. Yes. Okay. This appears to be the '21, '22 policy issued to Beach Cruiser.

Q. Okay. And I'm going to zoom in just a little bit. Is that number -- The policy number at the top of the screen, GGL0026067, is that consistent with the policy number on the letter I just showed you?

A. I would have to see the letter again to confirm, but I believe that's the case, yes.

Q. Okay. All right. I have it up for you right here.

A. Yes, it is.

Q. Okay. So I am going to take you down to the amended conditions endorsement. Is this the endorsement that is referred to in the complaint?

A. Yes.

Q. Okay. And this is the endorsement that Mt. Hawley is -- well,

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Q. Okay. I'm going to -- Actually, I don't remember whether we marked the November 14th letter as an exhibit. If not, let's mark it as Nationwide Exhibit D.

(Nationwide Deposition Exhibit D marked for identification.)

BY MR. KATZENMEIER:

Q. Okay. I'm going to share my screen again with you, Mr. Brownell. Can you see my screen, Mr. Brownell?

A. Yes.

Q. Okay. Do you recognize this document?

A. Can you scroll to the top?

Q. Sure.

A. Can you scroll down until I say stop?

Q. Yeah. Absolutely.

A. I'm just looking for a form that identifies Beach Cruiser as the insured.

Q. Presumably, that would be in the declarations page, correct?

A. It actually refers to forms

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has asserted that Beach Cruiser has made representations based on?

A. This is the endorsement that Mt. Hawley is contending precludes coverage for this loss.

Q. Okay. So is this a standard endorsement in Mt. Hawley's policies?

A. Yes.

Q. Okay. Now when we say "standard," does that mean all Mt. Hawley policies contain this form?

A. I know, in the GBA product, this form is mandatory on all policies. And for other Mt. Hawley policies that are not part of the GBA product, I do believe it is also mandatory on theirs as well, but I know for certain that this is a mandatory endorsement on all policies issued by GBA -- or through the GBA product.

Q. Okay. And do you know how long has this been a standard required endorsement?

A. Well, since early 2021, March, I believe.

<p style="text-align: right;">142</p> <p>1 to expedite one and not the other, 2 and we'll split the costs for 3 that, I'm fine with that. 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">143</p> <p>1 UNITED STATES OF AMERICA) 2 SOUTHERN DISTRICT OF NEW YORK) 3) SS 4 STATE OF ILLINOIS) 5 COUNTY OF COOK) 6 7 I, Alyssa N. Kuipers, 8 Certified Shorthand Reporter, Registered 9 Professional Reporter, do hereby certify 10 that MT. HAWLEY INSURANCE COMPANY was 11 first duly sworn by me to testify to the 12 whole truth and that the above deposition 13 was reported stenographically via Zoom by 14 me and reduced to typewriting under my 15 personal direction. 16 I further certify that the 17 said deposition was taken at the time 18 specified and that the taking of said 19 deposition commenced on the 15th day of 20 December, 2023. 21 I further certify that I am 22 not a relative or employee or attorney or 23 counsel of any of the parties, nor a 24 relative or employee of such attorney or 25 counsel, nor financially interested directly or indirectly in this action.</p>
<p style="text-align: right;">144</p> <p>1 Witness my official 2 signature on this 19th day of December 3 2023. 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">_____ ALYSSA N. KUIPERS, CSR, RPR</p> <p>CSR No. 084-004857</p>	

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